

In preparing the summary report of the April 12 Panel meeting, it would be most helpful if you would please summarize your thoughts and recommendations from the meeting and send to both the ERG contractor (Kate.Schalk@erg.com) and me by the middle of next week. Please also copy the rest of the Panel on your response. Thank you.

Following is a non-exhaustive list of my “thoughts” following the April 12, 2004 meeting of the EPA Expert Panel:

1. The ongoing concerns about possible continuing contamination – or recontamination of previously cleaned sites – will not adequately be addressed by restricting the testing program to previously cleaned locations. Therefore the testing program should be expanded to include additional apartments, as well as businesses, schools and governmental worksites.
2. Asbestos cannot be used as a surrogate for the other contaminants in the current EPA list of contaminants. EPA failed to provide data establishing the specificity and sensitivity of asbestos as a surrogate. To the contrary, the limited amount of data available to us in the background documents showed the opposite: asbestos failed to adequately predict levels of vitreous fibers or lead. Indeed, it appears that it is difficult even to use asbestos measures taken in one location to predict concentrations even in nearby locations (within 500 m).
3. The protocol for further testing needs careful consideration. Such consideration must consider what kind of testing is to be done (e.g. wipe samples, HVAC systems, aggressive vs. non-aggressive air sampling) and the types and numbers of locations that should be targeted. Better estimates of likely levels of contaminants in the various types of locations are needed before the protocol can be finalized and meaningful estimates of power to detect effects can be made.
4. Many community stakeholders have a great deal of expertise that can be useful to a successful testing program. Community stakeholders will be instrumental in obtaining the cooperation needed to make the testing program successful. Further, the expert panel was, to a large extent, convened to address the concerns of community stakeholders. For these reasons, and others not enumerated here, the EPA and the expert panel should develop formal mechanisms (e.g. focus groups) to include community stakeholders in the protocol development and in the sampling process. Such a participatory research process will greatly enhance both the testing and the credibility of any conclusions that are drawn from the results.
5. There was a good deal of discussion about the question of risk and of exposure assessment. It is essential that the concepts of measuring contaminant levels and of assessing the risks associated with those levels be kept as separate tasks.